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MAY 23 2000

FOR

May 18, 2000

Honorable William E. Kennard  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

Dear Chairman Kennard:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, Vincennes University, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Vincennes University does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

The weighted average MLB PICC found in ILEC tariffs is about \$2.50 per line per month. The MLB PICC levied by major long distance carriers, however, is about \$4.00 per line per month. The long distance carriers claim that the PICCs that they charge only recover their costs, even though their mark-up exceeds fifty-five percent. Business users, including educational institutions, should not be required to bear this dead weight loss any longer.

To avoid the mark-up and the associated dead-weight economic loss, the pending CALLS proposal should be amended to include a LEC billed Multi-Line Business Super SLC. The MLB Super SLC would be an amount equal to the sum of what would have been the MLB SLC and the ILEC billed MLB PICC. This suggestion would not reduce by one penny the subsidy to residential loops, and would have no adverse revenue impact on any signatory to the CALLS plan if their representations about the MLB PICC are truthful.

Sincerely,

  
Carl Koenig  
Chief Information Officer

CK/jb

cc: ✓ Secretary, FCC



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May 18, 2000

Honorable Gloria Tristani  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
Ex Parte contact in CC Docket Nos. 96-262, 94-1/99-249 and 96-45

Dear Commissioner Tristani:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, Vincennes University, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Vincennes University does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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Sincerely,

  
Carl Koenig  
Chief Information Officer

CK/jb

cc: ✓ Secretary, FCC

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May 18, 2000

Honorable Michael K. Powell  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

Dear Commissioner Powell:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, Vincennes University, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Vincennes University does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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Sincerely,

  
Carl Koenig  
Chief Information Officer

CK/jb

cc: ✓ Secretary, FCC

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FCC 11:20AM

May 18, 2000

Honorable Susan Ness  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
Ex Parte contact in CC Docket Nos. 96-262, 94-1/99-249 and 96-45

Dear Commissioner Ness:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, Vincennes University, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Vincennes University does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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Sincerely,

  
Carl Koenig  
Chief Information Officer

CK/jb

cc: ✓ Secretary, FCC

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MAY 23 2000

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May 18, 2000

Honorable Harold Furchtgott-Roth  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554  
Ex Parte contact in CC Docket Nos. 96-262, 94-1, 99-249 and 96-45

Dear Commissioner Furchtgott-Roth:

I am writing about a particular aspect of the pending CALLS proposal. Specifically, Vincennes University, objects to retention of the Multi-Line Business PICC (MLB PICC) as a charge levied by long distance carriers. Vincennes University does not object to retention for the time being of the MLB PICC, provided that Local Exchange Carriers (LECs) bill the MLB PICC directly.

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Sincerely,

  
Carl Koenig  
Chief Information Officer

CK/jb

cc: ✓ Secretary, FCC